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6 Attorney for specially appearing Defendant Ortiz Machine
Company, LLC d/b/a Ortiz Gaming
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DERSE, INC., a Wisconsin Corporation

11 Plaintiff,

12 v.

13 ORTIZ MACHINE COMPANY, LLC,
d/b/a ORTIZ GAMING, a Florida limited
liability company,

14 Defendant.
15

Case No.: 2:18-cv-00192

**DEFENDANT ORTIZ MACHINE
COMPANY, LLC'S UNOPPOSED
MOTION TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT**

(First Request for Extension)

16 Pursuant to FED. R. CIV. P. 6(b) and Local Rule IA 6-1, Defendant Ortiz Machine
17 Company, LLC ("Ortiz"), by and through its attorneys, without waiving any jurisdictional
18 objections/defenses, moves for a 1-week extension to file its response to the complaint, and states:

19 Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i), Ortiz's response to the complaint is currently
20 due on or before February 26, 2018.
21

22 Ortiz recently retained local counsel in Nevada, and requires additional time to locate,
23 organize, and review relevant documents in order to prepare an appropriate response to the
24 complaint. This and other matters have prevented Ortiz from completing its response to the
25 complaint. Accordingly, Ortiz respectfully seeks a 1-week extension of time, up to and including
26 March 5, 2018, to respond to the complaint. This is Ortiz's first motion to extend the deadline to
27 respond to the Complaint.
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This motion is made in good faith and not for the purpose of delay.

Plaintiff will not be prejudiced by this limited extension of time given that there are currently no scheduled hearings in this case.

Counsel for Ortiz conferred with Plaintiff's counsel who stated that Plaintiff agrees with the requested extension of time.

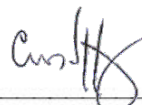
Dated: February 26, 2018

Respectfully submitted,

/s/Doreen Spears Hartwell
Doreen Spears Hartwell
Nevada Bar No. 7525
11920 Southern Highlands Pkwy.
Suite 201
Las Vegas, NV 89141
Attorneys for Defendant

IT IS SO ORDERED.

DATED: February 27, 2018



C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

1. On February 26, 2018, I served the following document(s):

**DEFENDANT ORTIZ GAMING'S UNOPPOSEDD MOTION FOR ETENSION
OF TIME TO RESPOND TO COMPLAINT**

2. I served the above-named document(s) by the following means to the persons as listed below:

X a. By ECF System: Anne Freeland, afreeland@michaelbest.com
John Wendland, jwendland@weildrage.com

☐ b. By United States Mail, postage full prepaid to:

☐ c. By messenger

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service:

☐ d. By direct e-mail (as opposed to through the ECF System)

Based upon the written agreement to accept service by e-mail or court order. I caused the document(s) to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ e. By fax transmission

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Doreen Spears Hartwell

An employee of Hartwell Thalacker, Ltd.